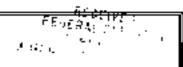
## PEOPLE HELPING PEOPLE



SEP 27 | | 109 Ail 194

September 21, 1994

Mr. Kenneth A. Davis, Jr. Reports Analyst, Reports Analysis Division Federal Election Commission 999 E Street, N.W. Washington, D.C. 20463

Dear Mr. Davis:

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TO:

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We are in receipt of your letter of inquiry of September 14, 1994 in regard to our Filing Report of 4/1/94-6/30/94 (L.D.#C00248948).

Our committee has limited administrative overhead. The only regular person or consultant retained by the committee is myself. I serve as the Treasurer and Executive Director. No goods or services are provided to the committee for which compensation is not paid. All administrative expenses were completely reported on Line 21(b) of Schedule B. The above accurately affects all reports filed by us since the formation of the committee in 1990.

If you have any further questions I can be contacted at (213) 489-4792.

Sincerely yours,

David L. Gould, Treasurer



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 2006.

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David L. Gould, Treasurer SEP | & 1994 People Helping People 600 Wilshire Blvd., Suite 1500 Los Angeles, CA 90017

Identification Number: C00248948

Reference: July Quarterly Report (4/1/94-6/30/94)

Dear Mr. Gould:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Your report discloses limited payments for administrative expenses. Administrative expenses are payments made for the purpose of operating a political committee including, but not limited to, rent, utilities, salaries, telephone service, office equipment and supplies. Any such payments to a person aggregating in excess of \$200 in a calendar year must be disclosed on Schedule B, supporting Line 21(b) of the Detailed Summary Page. 2 U.S.C. \$434(b)(5) If these expenses are being paid by a connected organization, your Statement of Organization must be amended to reflect this relationship. 2 U.S.C. \$433(b)(2) In addition, if expenses have been incurred but not paid in a reporting period, the activity should be disclosed as a debt on Schedule D, if the obligation is \$500 or more, or outstanding for sixty days or more. 11 CFR \$104.11

Any goods or services provided to your committee by a person, except volunteer activity (i.e., a person's time), would be considered an in-kind contribution from that person, and would be subject to the disclosure requirements of 2 U.S.C. §434(b)(3) and 11 CFR §104.13, and the limitations and prohibitions of 2 U.S.C. §\$441a and 441b.

Clarification regarding administrative expenses should be disclosed during each two year election cycle beginning with the first report filed in the non-election year. Please provide the necessary information regarding administrative expenses incurred by your

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committee and/or amend your report to disclose such expenses according to the referenced provisions of the Act and Commission Regulations.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Kenneth A. Davis, or

Reports Analyst

Reports Analysis Division

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## Federal Election Commission ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

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